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## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

EDWARD HATANPAA, an individual,

Plaintiff,

VS.

WELLS RURAL ELECTRIC COMPANY, a Domestic Cooperative Corporation; INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 1245, a foreign Trade Union; MIKE CROMIE, an individual; ZANE PETERS, an individual; KYLE MURPHY, an individual; ISMAEL RAMIREZ, an individual; DOE ENTITIES 1-50; and DOE INDIVIDUALS 1-50.

Defendants.

Case No. 3:16-cv-00005-LRH-VPC

JOINT ENE STATUS REPORT AND PROPOSED STIPULATION TO VACATE PRE-ENE CONFERENCE

## REPORT and STIPULATION

I.

Plaintiff EDWARD HATANPAA, and Defendants WELLS RURAL ELECTRIC COMPANY, MIKE CROMIE, ZANE PETERS, KYLE MURPHY, ISMAEL RAMIREZ, and DEFENDANT INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 1245, by and through their undersigned legal counsel of record, hereby submit this Joint Status Report, stipulating to vacate the Pre-Early Neutral Evaluation Status Conference scheduled to be held at 9:00 a.m. on August 18, 2016. Counsel for the parties hereby certify that: (1) the parties have made initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1); (2) Plaintiff has provided a computation of damages to Defendants, pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(iii); and (3) the parties have conferred whether to exchange portions of their evaluation statements and, presently, have

The Geddes Law Firm, P.C. 8600 Technology Way, Suite 115 Reno, NV 88521 Phone 775-853-9455	1	decided not to do so.	
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	3	Dated this <u>11<sup>th</sup></u> day of August, 2016.	
	4		THE GEDDES LAW FIRM, P.C.
	5		ein Selan
	6		WILLIAM J. GEDDES
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	8		8600 Technology Way, Suite 115 Reno, Nevada 89521 (775) 853-9455
	9		will@thegeddeslawfirm.com  Attorney for Plaintiff Hatanpaa
	10	Dated this _11 <sup>th</sup> day of August, 2016.	
	11		GOICOECHEA, DI GRAZIA, COYLE STANTON, LTD.
	12		/s/ Electronic Signature Authorized
	13		
	14		Gary E. Di Grazia, Esq. David M. Stanton, Esq.
	15		530 Idaho Street Elko, NV 891801
	16		Email: <a href="mailto:gdigrazia@frontiernet.net">gdigrazia@frontiernet.net</a> Email: <a href="mailto:davidstanton@frontiernet.net">davidstanton@frontiernet.net</a>
	17 18		Attorneys for Defendants Wells Rural Electric Company, Mike Cromie, Zane Peters, Kyle Murphy and Ismael Ramirez
	19	Dated this 11 <sup>th</sup> day of August, 2016.	
	20		DAVIS GRAHAM & STUBBS LLP
	21		/s/ Electronic Signature Authorized
	22		<u> </u>
	23		ELIZABETH HIGH Nevada Bar Number 10082
	24		50 West Liberty Street, Suite 950 Reno, Nevada 89501
	25		(775) 229-4219 Elizabeth.high@dgslaw.com
	26		Attorneys for Defendant International Brotherhood of
	27		Electrical Workers, Local Ūnion 1245
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II. **ORDER** THE COURT, HAVING REVIEWED THE PRECEDING REPORT and STIPULATION, and GOOD CAUSE APPEARING therefore, GRANTS the relief requested therein. IT IS HEREBY ORDERED that the Pre-Early Neutral Evaluation Status Conference in the above-captioned matter, currently scheduled to be held at 9:00 a.m. on August 18, 2016, is VACATED. IT IS SO ORDERED: DATED August 11, 2016.